

**UNITED STATES DISTRICT COURT
FOR THE COURT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Debtor.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY,

Debtor.

No. 17 BK 4780-LTS

SCIEMUS LIMITED, et al.

Plaintiffs,

-v-

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER
AUTHORITY; PREPA NETWORKS LLC;

Adv. Pro. No. 3:19-AP-369 LTS

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

PREPA NET INTERNATIONAL WHOLESALE
TRANSPORT, INC.; COMMONWEALTH OF
PUERTO RICO; and SECRETARY OF THE
TREASURY, c/o Public Insurance Bureau,

Defendants.

**CERTIFICATE OF NO OBJECTION REGARDING MOTION OF PUERTO RICO
ELECTRIC POWER AUTHORITY FOR ORDER APPROVING SETTLEMENT
AGREEMENT WITH CERTAIN INSURERS**

To the Honorable United States District Court Judge Laura Taylor Swain:

On October 6, 2020, The Puerto Rico Electric Power Authority (“PREPA” or the “Debtor”), through the Financial Oversight and Management Board for Puerto Rico (the “FOMB” or “Oversight Board”) as PREPA’s sole Title III representative pursuant to section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”) (collectively, “Defendants”), filed the *Motion of Puerto Rico Electric Power Authority Pursuant to Bankruptcy Code Section 105, PROMESA Section 315(a), and Bankruptcy Rule 9019 for Order Approving Settlement Agreement with Certain Insurers and Granting Related Relief* [Adv. Proc. No. 19-369; ECF No. 92] (the “Motion”). Defendants filed the *Notice of Motion* on October 7, 2020 [Adv. Proc. No. 19-369; ECF No. 93].

Responses or objections, if any, were to be filed and served no later than October 14, 2020. *Id.* at 1. On October 14, 2020, U.S. Bank National Association, solely in its capacity as the PREPA Bond Trustee, filed the *Statement and Reservation of Rights of PREPA Bond Trustee Regarding Motion for Approval of Settlement Agreement* [Case No. 17-bk-4780; ECF No. 2247] (the “Statement”). In its Statement, the PREPA Bond Trustee noted it “does not object to relief being sought in [PREPA’s] Motion.” *Id.* at 2-3.

According to this Court’s *Thirteenth Amended Case Management Procedures* [ECF No. 13512-1] (the “Case Management Procedures”) the Court may enter an order granting a request

for relief without a hearing upon receipt of a certificate of no objection (“CNO”, as defined by the Case Management Procedures). *See* Case Management Procedures, III.P.

In accordance with the Case Management Procedures, the undersigned hereby certifies that this CNO is filed not less than forty-eight (48) hours after the expiration of the Objection Deadline. The undersigned further certifies that counsel for the Oversight Board has reviewed the Court’s docket in the above-captioned cases not less than forty-eight (48) hours after expiration of the Objection Deadline, and, to the best of counsel’s knowledge, no applicable objection, responsive pleading, or request for a hearing with respect to the Motion appears on the docket, other than the Statement, which does not oppose the Motion’s requested relief or proposed order.

WHEREFORE PREPA respectfully requests the Court enter the proposed order attached hereto as **Exhibit A**.

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This the 16th day of October, 2020.

/s/ Hermann D. Bauer

Hermann D. Bauer

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Carla Garcia Benitez

USDC No. 203708

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